

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

MEI YING LIU and SHU FANG CHEN,  
Plaintiffs,

v.

ORIENTAL BUFFET, INC., d/b/a KING CHEF  
BUFFET; METROPOLITAN BUFFET  
CORPORATION, d/b/a METROPOLITAN  
BUFFET; AN NA ZHENG; XIAO YANG  
ZHENG; BEN LIANG ZHU; FRANK CHAN,  
a/k/a KAI TUNG CHEN, a/k/a KAI TONG  
CHEN, a/k/a KAI CHIANG CHAN, a/k/a KAI  
CHEUNG CHAN, a/k/a KAI CHEONG CHAN;  
and DE GI CHING, a/k/a TEH QI CHING, a/k/a  
JIMMY CHING,

Defendants.

Civil Action No. 03-2406 (KSH)

Honorable Katharine S. Hayden, U.S.D.J.

**AFFIDAVIT OF MEI YING LIU IN  
SUPPORT OF DAMAGES FOR  
COUNTS 6 THROUGH 9 OF THE  
ORIGINAL COMPLAINT**

1. I worked as a waitress at King Chef Buffet for 17.5 months, from May of 2000 until November 11, 2001.
2. During those 17.5 months, my employers controlled my life 24 hours a day and completely isolated me from the outside world. I lived in an apartment that the employers owned, was picked up in the morning by my employers, had every move scrutinized during 13 hours of work during the day, and was taken back to the employers' apartment after work.
3. At the restaurant, I was treated differently than the male waiters from the north of China because of my Fujianese ethnicity and because I am a woman. The discriminatory treatment by my employers at King Chef Buffet, the threats made by my employers, and

the conditions in which I was housed caused me great pain and suffering. I continue to experience pain and suffering to the present day.

4. During the time that I worked at King Chef, I was not paid any wages and was only permitted to keep a portion of the tips that I earned. At the end of each workday, I had to give a portion of my tips to my employers as a kickback. I also sometimes had to pay customers' bills, even if the customers had already paid for their meals. These practices made me feel as though I was not a full person entitled to the money I earned, and sometimes caused me to break down crying.
5. The employers at King Chef gave more tables to the male waiters from the north of China than they gave to me and the other Fujianese women, thereby ensuring that the non-Fujianese men received significantly more in tips. They also steered larger parties and better-tipping patrons to tables served by male waiters from the north of China. Because our only income was from tips, this policy of ethnic and gender discrimination caused me to earn less money than did the male waiters from the north of China, even though I am equally qualified to wait on tables.
6. Even when a particular customer asked to be seated in my section, the customer was seated in a non-Fujianese male waiter's section if he had an empty table or even if he had no empty tables but a customer was almost finished. The employers would even help the non-Fujianese male waiter clear the table so that he could wait on the new customer.
7. On some days, I received only a couple of tables during the entire thirteen hours I was at the restaurant—not because it was a slow day but because the employers did not want me to earn tips. Instead of waiting on tables, I had to perform side work, such as polishing brass fixtures, for which I was not paid. In addition, when an afternoon "break" was

instituted, I was not permitted to take a break but was required to continue performing side work, even though I was paid no wage for this work.

8. On one occasion, my wallet, which had one week's worth of tips in it, was stolen from the King Chef restaurant. I wanted to report the theft to the police, but the employers would not let me call the police. I was so upset and cried so much that I became sick.
9. I had to support my family, including two children here in the United States and family members in China, with the tips I earned at King Chef. The fact that I was not permitted to earn as much in tips as the male waiters from the north of China, and that I had to give some of my tips back to the employers, caused me great hardship and embarrassment.
10. I was also humiliated by my employers, especially An Na Zheng, on a daily basis. An Na Zheng yelled at me and called me a "stupid Fujianese woman." I felt that she looked down on me because of my Fujianese ethnicity and because I am a woman.
11. Every time I made even a very minor mistake, An Na Zheng yelled at me, whereas she did not yell at male waiters from the north of China when they made similar mistakes. I was treated as though I was a stupid person who could not understand even the most simple tasks.
12. An Na Zheng ridiculed my English language capabilities even though I spoke just as well as the male waiters from the north of China. She called me and other female Fujianese waitresses stupid and uneducated.
13. The employers did not permit us to use the telephone at work. In addition, we did not have access to a phone at the King Chef apartment and the nearest pay phone was a ten-minute walk through a dangerous neighborhood. The feeling of complete isolation caused

by not having access to a telephone, and the inability to communicate with my family, caused me great emotional distress.

14. The conditions at my employers' apartment, where I lived with fourteen to sixteen other people for all but a couple of the months that I worked at King Chef, also caused me great pain and suffering.
15. Seven to eight women slept in bunk beds in one bedroom. We had no place to keep our personal belongings and had to crawl over each others' beds to enter and leave the room. There was no sitting or standing space in the bedroom, only the bunk beds.
16. The apartment was very dirty. I regularly saw cockroaches in the apartment. There were times when we did not have electricity or running water in the apartment. There was even one occasion when we had no electricity for two full weeks. When we did not have electricity, my co-workers and I had to purchase our own candles.
17. All fifteen to seventeen people living in the apartment shared one bathroom. While we frequently did not have hot water at all, we lined up for the bathroom very early in an attempt to get at least a few seconds' worth of hot water. My efforts were not usually successful, and I had to take a quick cold shower with my co-workers, including men, pressuring me to rush in the bathroom. I bought a shower curtain for the bathtub because the one provided by the employers was filthy.
18. When I and other female tenants had to get up during the night to use the bathroom, we had to pass by the male occupants. The men sometimes harassed us by whistling at us and jumping out from the dark to scare us.
19. I worked and lived under the complete control of the King Chef employers for almost one and a half years. Eventually, I could not take the daily humiliation, the discriminatory

policy of being denied the same number of tables as males from northern China, the harm and humiliation of not being paid a wage for my work, the terrible conditions in the employers' apartment, and the sense of total isolation from the outside world. I felt an extreme amount of pressure, became anxious, and started developing a bad temper—traits that I did not have before working at King Chef and which negatively affected my relationship with my family. I felt that I was valued as something less than a human being and that I was on the verge of a breakdown, and so decided I had to leave.

20. When Shu Fang Chen and I told An Na Zheng that we were quitting our jobs because of the discriminatory treatment and other bad conditions, she threatened us. She told us that we should think about the consequences before we “took any action,” such as initiating a legal action, because we had families.
21. I had previously overheard An Na Zheng tell somebody that a life in Chinatown is worth \$10,000. In addition, when a former employee had filed a legal action, the King Chef employers paid people to follow him around and harass him.
22. The comment about the value of a life in Chinatown, plus the experience of the previous employee who had filed a legal action, plus the threat articulated by An Na Zheng when I quit, all led me to believe that she and the other King Chef employers were capable of harming me and my family. This fear has caused my family and me great emotional distress.
23. I continue to fear that the King Chef employers will try to harm me and my family. It is for this reason that I have not listed my home address in any legal documents and I have not listed the nickname by which I am commonly known.

24. I believe that the defendants in this case had evil motives in undertaking the above actions, and that they acted in complete disregard of my right to be treated as a full human being, of equal worth as non-Fujianese men.

Date: 8/19/03

Mei Ying Liu

Mei Ying Liu

SWORN TO BEFORE ME  
ON 19th DAY OF Sept, 2003

Jie min Zhao

JIE MIN ZHAO  
NOTARY PUBLIC, State of New York  
No. 012H5039109  
Qualified in Queens County  
Commission Expires Feb. 13, 2007